REMARKS

The Examiner is thanked for his review of this application. Claims 1-22 remain pending after entry of the present Response.

Rejections under 35 U.S.C. § 103

Claims 10 and 12-21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Finch et al. ("Finch") (U.S. Patent No. 5,805,796) and Ashe et al. ("Ashe") (U.S. Patent No. 6,307,574 B1). These rejections are respectfully traversed.

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references or in the knowledge generally available to one having ordinary skill in the art, to combine the references. Additionally, the references when combined must teach or suggest all the claim limitations. As discussed below, the Office has not established a *prima facie* case of obviousness because there is neither suggestion nor motivation, in either the references or in the knowledge of one having ordinary skill in the art at the time of the invention, to have combined the references in the manner proposed. Furthermore, the references when combined do not teach or suggest all of the claim limitations.

Ashe teaches a method by which program code relating to GUI elements can be organized into a multi-level structure of classes. A class defining a structure and a function of the GUI element resides at one level within the multi-level structure of classes. A class defining an appearance of the GUI element resides at another level within the multi-level structure of classes. Only one instance of the class defining the structure and the function of the GUI element is required, regardless of the number of instances of the class defining the appearance of the GUI element. In this manner, Ashe teaches the implementation of

multiple appearance themes for a GUI element without having to repeat the structure and function class definitions for each theme.

With regard to claim 10, the Office asserts that Ashe shows examining the class definition of a screen element of a GUI (column 3, lines 10-20 and column 6, lines 1-25) wherein examining is performed without execution of the class definition (column 5, lines 5-14), and identifying an element if the class definition includes a method supporting the element (column 6, lines 5-10 and 34-55). Ashe (particularly column 3, lines 10-20 and column 6, lines 1-25) does not teach or suggest _examining a class definition of a screen element of a GUI to detect an ability to process an input device's events_. Ashe only teaches a multi-level class structure for separating the code associated with functionality and structure of the GUI element from the code associated with appearance of the GUI element. Thus, Ashe only teaches a method by which the class definitions of a GUI element are organized. Ashe does not mention or infer any examining. Furthermore, _examining a class definition of a screen element of a GUI to detect an ability to process an input device's events_ is not pertinent to what Ashe is teaching.

Further with respect to claim 10, the claim recites that said examining is performed without execution of said class definition. Ashe (particularly column 5, lines 5-14) does not teach or suggest that said examining is performed without execution of said class definition. As previously stated, Ashe does not teach or suggest said examining at all. Ashe, column 5, lines 5-14, actually teaches that "functionality associated with an object may also include a behavioral characteristic in which the object occupies different states _in dependence upon user actions_. For example, when a push button is actuated or a menu command is selected, it may go from a normal state to a highlighted state." Thus, it is clearly stated in Ashe that the behavioral characteristics (e.g., changing the appearance of the GUI element) _is dependent on user action_. Notwithstanding the fact that Ashe does not teach or suggest said

examining, the teachings in Ashe as cited by the Office (column 5, lines 5-14) actually teach away from the claimed invention. Specifically, claim 10 states that said examining is performed without execution of said class definition. According to Ashe, an object's functionality with regard to behavioral characteristics (e.g., object appearance) is dependent on user action (i.e., user activation of the object) which directly contradicts the presently claimed invention, which states that said examining is performed without execution of said class definition.

Further with respect to claim 10, the Office asserts that identifying an element if the class definition includes a method supporting the element is taught by Ashe, column 6, lines 5-10 and 34-55. First of all, the subject portion of the claim reads as follows: "automatically identifying said screen element as supporting input device input if said class definition includes a method supporting said input device's input." It is not clear that the Office's statement of "a method supporting the element" is equivalent to the claim language of "a method supporting said input device's input." Notwithstanding this ambiguity, Ashe (column 6, lines 5-10 and 34-55) still fails to teach or suggest this particular element of the claimed invention. Ashe (column 6, lines 5-10 and 34-55) teaches that each separate appearance of a control object has its own definition with its own associated program code. Ashe also teaches the use of core control classes to implement the basic functionality and overall appearance of the control objects. In the context of Ashe, there is no teaching that corresponds to examining the core control classes associated with the control object to identify the associated GUI element if the class definition includes a method supporting an input device's input. Thus, the teachings of Ashe (column 6, lines 5-10 and 34-55) are not relevant to the presently claimed invention.

Further with respect to claim 10, the Office states the following: "Ashe et al. do not specifically state the element is supporting an input device, but does use class definitions to

determine support for an element, for analysis and control of the gui system." The applicants agree that Ashe does not specifically or inferentially state, teach, or suggest examining a class definition of a screen element of a GUI to detect an ability to process an input device's events. There are no teachings or suggestions in Ashe related to determining support for an element. Ashe simply teaches the use of class definitions organized in a hierarchical manner to provide for efficient multiple themed implementation of GUI elements such as a control objects or menus. "To determine support for an element" or "to detect an ability to process an input device's events" are both objectives that require specific actions to be accomplished. The mere fact that Ashe, or any other reference, uses class definitions to implement a screen element of a GUI does not imply that there is a determination or detection being made of the class's capabilities. Such a determination or detection involves specific and focused actions that are not taught or suggested by Ashe, but are claimed by the present invention.

Further with respect to claim 10, the Office asserts that Finch determines that the element is supporting an input device (column 5, lines 60-68 and column 6, lines 1-20), in a system using class definitions for analysis and control of a GUI system (column 8, lines 29-45). Finch does not teach or suggest any part of claim 10. Furthermore, the cited portions of Finch as relied on by the Office do not appear to be pertinent to the presently claimed invention. Additionally, there is no suggestion or motivation in either Ashe or Finch to combine their respective teachings. It is respectfully submitted that the Office has not established a prima facie case of obviousness.

With regard to claim 12, the Office refers to Ashe (column 5, lines 7-14) to assert that the examining is performed at runtime. As previously submitted, Ashe does not teach or suggest *examining* a class definition of a screen element of a GUI to detect an ability to process an input device's events. Furthermore, as previously submitted, Ashe (particularly

column 5, lines 5-14) does not teach or suggest that said examining is performed without execution of said class definition.

With regard to claim 13, the Office refers to Ashe (column 5, lines 1-13) to assert that the element is marked if the class definition includes support for the input device. However, Ashe does not teach marking said screen element if said class definition includes a method supporting said input device's input, wherein said class definition has been examined, without execution, to detect an ability to process an input device's events. In contrast to the claimed invention, Ashe teaches changing the appearance of the screen element in response to user execution of the screen element.

With regard to claim 14, the Office refers to Ashe (column 4, lines 55-68) as showing that the process was delegated to other code. Claim 14 requires that said examining step (in claim 10) includes determining if said screen element has delegated processing of said input device's input to other program code and identifying said screen element as supporting said input device if said processing is so delegated. As previously submitted, Ashe does not teach or suggest _examining a class definition of a screen element of a GUI to detect an ability to process an input device's events_, much less extending said examination to other program code to determine if said screen element has delegated processing of said input device's input.
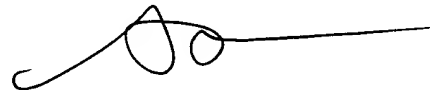
The Office states that claims 15-21 show the same features as claims 10 and 12-14 and are rejected for the same reasons. Correspondingly, it is submitted that a prima facie case of obviousness against claims 15-21 has not been established in view of Ashe and Finch for at least the same reasons as previously identified with respect to claims 10 and 12-14.

Neither the teachings nor the nature of the problem solved in either Ashe or Finch, or the combination thereof, motivate or suggest to one of ordinary skill in the art at the time

of the invention to combine the reference teachings in a manner that would make the claimed invention obvious. Furthermore, neither Ashe nor Finch, nor the combination thereof, teach all of the features of claims 10 and 12-21. Thus, a *prima facie* case of obviousness has not been established. For at least these reasons, the Applicants respectfully request that the rejections of independent claims 10, 15, 18, and 21 be withdrawn. For at least the same reasons, the Applicants respectfully submit that dependent claims 12-14, 16-17, and 19-20 are patentable over the cited art of record.

Accordingly, a notice of allowance is respectfully requested. Alternatively, the Applicants submit that the claims, in view of the art of record, are in condition for Appeal. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900 x6903. If any additional fee other than the enclosed fees are due in connection with filing this amendment, the Commissioner is authorized to charge to such fees Deposit Account No. 50-0805 (Order No. SUNMP068). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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